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November 21, 2003

Lynda L. Dorr  
Secretary to the Commission  
Public Service Commission  
P.O. Box 7854  
Madison, WI 53707

Re: Wisconsin State Telecommunications Association et al  
Petition for Temporary Exemption

Dear Lynda L. Dorr:

Enclosed is the original and twenty copies of a Petition by the Wisconsin State Telecommunications Association and several local exchange carriers (LEC) requesting the Commission open a docket concerning several requests by wireless carriers for number portability from LECs.

The Wisconsin State Telecommunications Association is hereby withdrawing its earlier petition on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ray J. Riordan".

Ray J. Riordan

BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN

In the Matter of the ILEC Division of the Wisconsin State  
Telecommunications Association on behalf of these Members  
Amery Telecom, Inc., Amherst Telephone Company, Bayland  
Telephone Co., Bloomer Telephone Company, CenturyTel of the  
Midwest-Wisconsin LLC, CenturyTel of the Northwest  
Wisconsin LLC, Chequamegon Communications  
Cooperative, Cochrane Cooperative Telephone Company,  
Coon Valley Farmers Telephone Company Inc., Indianhead  
Telephone Company, LaValle Telephone Cooperative, Manawa  
Telephone Company, Marquette Adams Telephone Cooperative  
Inc., The Mosinee Telephone Co.,  
Nelson Telephone Cooperative, Hager Telecom, Inc.,  
State Long Distance Telephone Company, Telephone USA of  
Wisconsin, Tri-County Telephone Cooperative Inc., Wood  
County Telephone Co. and West Wisconsin Telecom Cooperative  
Petition for Suspension of Wireline To Wireless Local Number  
Portability Obligations Pursuant to Section 251(f)(2) of the  
Communications Act of 1934, as Amended, and to Rule that the  
Wireless Carriers' Requests are Not Bona Fide Requests

Docket No. \_\_\_\_\_

**PETITION FOR SUSPENSION OF THE  
LOCAL NUMBER PORTING OBLIGATION**

Pursuant to Section 251(f)(2) of the Communications Act of 1934, as amended (the Act),  
the ILEC Division of the ILEC Division of the ILEC Division of the ILEC Division of the  
Wisconsin State Telecommunications Association (ILEC Division) on behalf of the following  
members: Amery Telecom, Inc., Amherst Telephone Company, Bayland Telephone, Inc.,  
Bloomer Telephone Company, CenturyTel of the Midwest-Wisconsin LLC, CenturyTel of the  
Northwest-Wisconsin, Chequamegon Communications Cooperative, Cochrane Cooperative

Telephone Company, Coon Valley Farmers Telephone Company Inc., Indianhead Telephone Company, LaValle Telephone Cooperative, Manawa Telephone Company, Marquette Adams Telephone Cooperative Inc., The Mosinee Telephone Company, Nelson Telephone Cooperative, Richland-Grant Telephone Cooperative, State Long Distance Telephone Company, Tri-County Telephone Cooperative Inc., Wood County Telephone Company and West Wisconsin Telcom Cooperative (individually “Petitioner” and collectively “Petitioners”), by counsel, hereby respectfully request that the Public Service Commission of Wisconsin (Commission) grant a temporary exemption to the Petitioners from porting numbers wireline-to-wireless as requested by the CMRS providers.

ILEC Division and Petitioners request the Commission to suspend temporarily the Petitioners’ individual obligations to provide “number portability,” as that term is defined by applicable law,<sup>1</sup> to the requesting CMRS providers. As demonstrated herein, the statutory criteria for the petitioned suspension are met with respect to the CMRS providers’ request. Grant of this petition will permit the Commission to ensure that the public interest, convenience and necessity are not undermined in the provision of wireline-to-wireless number portability.<sup>2</sup>

Those requests do not contain sufficient information as required by the FCC rules; the

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<sup>1</sup> The Communications Act of 1934, as amended (the “Act”) defines number portability as “the ability of users of telecommunication services to retain, *at the same location*, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another.” 47 U.S.C. §153 (30) (emphasis added). *See also* 47 C.F.R. §52.21(p) (defining “service provider portability” identically to “number portability”).

<sup>2</sup> The Petitioners utilize the terms “wireline-to-wireless portability” and “intermodal portability” synonymously.

information provided is insufficient to enable the petitioners to provide local number portability (LNP) because they contain no routing, procedures or other necessary information; they request location portability which is not allowed by FCC rules; and many of the requests appear to be for porting the calls to a location with a different rating.

Although the FCC promised that it would act “well in advance” of the operative date of November 24, 2003,<sup>3</sup> it did not release its decision until November 10, 2003.<sup>4</sup> The Order did extend the implementation date for most Petitions until May 24, 2004. However for Petitioners with rate centers in the largest 100 MSAs there was no extension. These Petitioners are concerned that they cannot meet the deadline of the FCC Opinion and Order. The FCC realized the importance of extending the implementation date for small and rural carriers to the May 24, 2004 extension as was expressed by Commissioners Martin and Adelstein.<sup>5</sup>

Further, the Opinion and Order did not clarify all of the critical issues and raised additional significant issues as addressed in this Petition. The Petitioners, therefore, request prompt action on this Petition.

## **I. Summary**

The subject matter of this Petition is not related to the on-going public policy debate

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<sup>3</sup> In responding to questions regarding FCC action on pending issues regarding number portability, John Muleta, Chief of the FCC’s Wireless Telecommunications Bureau stated, “We’ll do it soon. . . . We’ve said that we will address it well in advance of the Nov. 24 LNP deadline.” “FCC Officials Press Wireless Firms to Move Ahead on LNP Deployment,” TR Daily, Sept. 8, 2003 ed.

<sup>4</sup> *In the Matter of Telephone Number Portability, CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, in CC Docket No. 95-116 (rel. November 10, 2003).

<sup>5</sup> See Separate Statements of Commissioners Kevin J. Martin and Jonathan S. Adelstein *Id.*

between CMRS providers and regulators regarding the ability of *wireless customers* to keep their mobile telephone numbers when *changing wireless services providers*.<sup>6</sup> Rather, this Petition requests that the Commission exercise its authority to address the effect of the requests for inter-modal porting on the Petitioner' customers. Such action is necessary to ensure that the customers of these Petitioners are not forced to bear unnecessary and potentially wasted costs of implementing vague and undeveloped directives associated with providing intermodal portability to CMRS providers of rate-center specific telephone numbers across the state and, potentially, across the country.

Action is also necessary to ensure that the Petitioners are not burdened by improperly broad requests to implement number portability in a manner that is inconsistent with applicable rules. Because number portability requires the proper routing and completion of end user calling, the failure of the requesting CMRS providers to respond to several Petitioners' legitimate questions demonstrates the necessity of Commission action to ensure that implementation issues are addressed.

As reflected by the Petitioner-specific information provided in Attachments, the Petitioners will experience varying levels of cost, and require differing amounts of time, to equip their respective switches with porting capability upon the receipt of a *bona fide* request for

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<sup>6</sup> The on-going debate regarding the wisdom of wireless local number portability has been widely reported in the trade press. The issues raised herein, however, are unrelated to this debate, but rather focus on the distinct and recognized problems that arise in the context of porting between CMRS carriers and LECs, or so-called "inter-modal" porting. See, e.g., *In the Matter of Telephone Number Portability: Second Report and Order*, 12 FCC Rcd 12281, 12334 (1997) (the FCC directing the North American Numbering Council ("NANC") to "consider other issues of concern to CMRS providers, such as how to account for differences between service area boundaries for wireline verses wireless services . . .").

porting. One substantial cost that will be fairly uniform among the small telephone companies is the LNP database. VeriSign, a provider of the service, advised that the cost of the Service Order Administration is a minimum monthly fee of \$1,200 and the minimum monthly query costs is \$150.

As demonstrated herein, however, installation of number portability capability only partially resolves the issue – unresolved implementation problems render the provision of local number portability unduly economically burdensome, technically infeasible and will have a significant adverse economic impact on users of the Petitioners' telecommunications services.

Accordingly, for the reasons provided herein, the Petitioners respectfully request that the Commission grant them the temporary suspension described below of any obligation to provide wireline-to-wireless number portability. The Petitioners believe that the existing uncertainties and accompanying public policy interests can be addressed as follows:

1. Temporary suspension of the Petitioners' obligation to provide number portability to a CMRS provider until six months following Judicial review of the FCC's Opinion and Order and the FCC's revision of its Opinion and Order as directed by the Courts *In the Matter of Telephone Number Portability CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, CC Docket No. 95116 (rel. November 10, 2003) (recognizing that one or more of the Petitioners may find it necessary to seek further Section 251(f)(2) relief); and
2. the CMRS providers have provided sufficient information for the Petitioners and the CMRS providers to develop the method, procedures, networking, routing and other necessary information for the completion of LNP calls and that such porting is to an interconnection point in the same LATA as where the Petitioner is located.

In addition, the Petitioners request that while the Commission considers this Petition, it promptly grant Petitioners: Amery Telecom Inc., Baldwin Telecom Inc., CenturyTel of the Midwest-Wisconsin LLC, CenturyTel of the Northwest Wisconsin LLC and Telephone USA of

Wisconsin LLC. who have rate centers and service territories within the 100 largest MSAs, an immediate suspension of all number portability obligations to CMRS providers. The Commission's exercise of this explicit Section 251(f)(2) authority<sup>7</sup> will provide sufficient time to address and resolve the significant issues surrounding the Petitioner's obligations in a reasonable and thoughtful manner while avoiding potentially detrimental consequences to the Petitioners' end users. Accordingly, a prompt grant of this aspect of the Petition will serve the public interest.

## **II. Background**

### **A. The Petitioners are Eligible to Seek this Relief**

Each of the Petitioners is a rural telephone company (except CenturyTel of Central Wisconsin LLC, CenturyTel of the Midwest-Kendall LLC and Telephone USA of Wisconsin LLC), as defined by the Act and provide telecommunications service within Wisconsin.<sup>8</sup> Additionally, each Petitioner satisfies the criteria set forth in Section 251(f)(2), which provides in pertinent part, that LECs "with fewer than two percent of the Nation's subscriber lines installed in the aggregate nationwide may petition a state commission for a suspension or modification"<sup>9</sup>

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<sup>7</sup> Pending action on the specific request for modification or suspension, the Commission "may suspend enforcement of the requirement or requirements to which the petition applies with respect to the petitioning carrier or carriers." 47 U.S.C. §251(f)(2).

<sup>8</sup> 47 U.S.C. §153(37). Each Petitioner provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. *See* 47 U.S.C. §§153(37)(B) and (C).

<sup>9</sup> 47 U.S.C. §251(f)(2).

of the number portability requirements.<sup>10</sup>

**B. The Requests of the CMRS Providers are not *Bona Fide* Requests**

A LEC's obligation to provide number portability is premised upon receipt of a *bona fide* request. The FCC has established certain specific information that a request must contain in order to be *bona fide*. Where this information is absent from or not reasonably clear in a request the request is not *bona fide*, and the LEC is under no obligation to provide number portability. Further, a request made for interconnection that is not permitted by the FCC rules would not be a *bona fide* request. The CMRS providers sent requests for LNP on a mass basis. It is Petitioners understanding that hundreds of telephone companies received the requests. The requests contained minimal and significantly insufficient information relating to the individual Petitioner's provision of LNP service. The requests referred to in the Attachments wanted implement portability by November 24, 2003. None of the requests of Sprint PCS, Verizon Wireless and T-Mobile are *bona fide*. Many of the Petitioners responded to the CMRS providers challenging the validity of its request for one or more of the following reasons:

- (1) The request failed to specify or incorrectly specified the "discrete geographical area" as required by FCC Rules.<sup>11</sup>

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<sup>10</sup> Section 251(b)(2) states that "The duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission." 47 U.S.C. §251(b)(2).

<sup>11</sup> See *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Telephone Number Portability: Fourth Report and Order in CC Docket No. 99-200 and CC Docket No. 95-116, and Fourth Further Notice of Proposed Rulemaking in CC Docket No. 99-200*, CC Docket Nos. 99-200, 96-98, 95-116 (rel. June 18, 2003) at para. 10 ("Requesting telecommunications carriers must specifically request portability, identify the discrete geographic area covered by the request, and provide a tentative date by which the carrier expects to utilize number portability to port prospective customers").



- (2) The request failed to specify or incorrectly specified switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific.<sup>12</sup> For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests do not provide the location to which the Petitioners are to port the number. It is likely that for many of the LNP requests that the location of interconnection between the CMRS provider and the Petitioner will not be in the same LATA in which the Petitioner is located. *The Wireline-Wireless Porting Order, supra*, footnote 75 the FCC stated, "Accordingly, we clarify that our ruling is limited to porting within the LATA where the wireless carrier's point of interconnection is located..."
- (4) The requests failed to demonstrate that the CMRS providers are in compliance with the FCC Rules that number portability is required only if requested by "another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate."<sup>13</sup> Several Petitioners challenge the CMRS providers because they do not believe the CMRS providers have service in the Petitioner's service territory.

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<sup>12</sup> The FCC's orders and rules require LECs to implement service provider number portability only "in switches for which another carrier has made a specific request . . ." See, e.g., *In the Matter of Telephone Number Portability: First Memorandum Opinion and Order on Reconsideration*, 12 FCC Rcd 7236, 7273 (1997) ("Number Portability Reconsideration"); see also 47 C.F.R. §52.23(c).

<sup>13</sup> 47 C.F.R. §52.23(c).

- (5) Furthermore, several Petitioners also note that there is no service agreement in place between it and the CMRS providers on how to provide porting. Without such an agreement or other exchange of information regarding the methods, procedures, networking and routing between the Petitioners and the CMRS providers the porting is unknown and cannot be completed. Petitioners are concerned about the absence of such agreements and the CMRS providers' failure to specifically request an interconnection agreement.

To date, the CMRS providers either have not responded or have provided non-responsive answers.

Because the CMRS provider requests are not *bona fide*, Petitioners' obligations to provide number portability have not been triggered. Verizon Wireless, and presumably Sprint and T-Mobile, disagree that the requests are not *bona fide*. This disagreement regarding whether the CMRS providers' requests are *bona fide* is further reason to grant this Petition. A temporary suspension of the parties' obligations with respect to wireline-to-wireless portability are discussed in more detail below. It will also allow the Petitioners and CMRS providers to work out any disputes regarding the *bona fide* nature of the requests.

**C. The Petitioners' Service Areas and Operations Support the Requested Relief**

As the Commission is aware, the Petitioners each provide local exchange and exchange access services within their individual respective service areas. Attachments 1 through 22 identifies the counties served by each Petitioner, and the rate centers associated with each

Petitioner's service area. Almost all of these service areas as shown on the Attachments encompass areas that are sparsely populated. On average the areas served by the Petitioners have 28 access lines per square mile. By comparison SBC, Wisconsin's largest local exchange carrier has over 300 access lines per square mile. SBC has a density of access lines that exceeds the average of the Petitioners by 11 times. Very few of the rate centers are located within the largest 100 metropolitan statistical areas (MSAs).

**D. There Remains Considerable Uncertainty  
with Respect to Wireline-Wireless Porting**

There remains considerable uncertainty because the *Wireline-Wireless Porting Order*, *supra*, changes earlier rules regarding porting. These rule changes were made without proper notice and against earlier FCC public interest concerns. The *Wireline-Wireless Porting Order* creates new concerns including: where and how to interconnect since a presence in the rate center is no longer required; is the point of interconnection within the LATA; how to maintain the original rate center designation and rating when the number is ported to a point of interconnection that is located outside the original rate center; and why must our Petitioners port numbers without a means of being compensated. In addition there remains the issues about what is considered a significant adverse economic impact on users of rural telephone customers or unduly economically burdensome.

Already challenges to the *Wireline-Wireless Porting Order* have been made to the FCC<sup>14</sup>.

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<sup>14</sup> United State Telecom Association, CenturyTel, Inc., and CenturyTel of Colorado, Inc. have filed a Joint Petition for Stay Proceeding Judicial Review of the Commission's November 10, 2003 Wireless to Wireline Porting Order.

More are expected. The FCC decision was rendered only two weeks prior to the date for implementing local number porting in the 100 largest MSAs. The Petitioners in those areas need immediate relief.

Until the uncertainty surrounding the implementation of wireline-to-wireless number portability is resolved, LEC's obligations concerning such porting are unclear and the lack of clarity will continue to exist until there is an FCC decision in the *Wireline-Wireless Porting Order Notice of Proposed Rulemaking*, *supra*, and a decision in the significant legal challenges the Order.

**E. The "Service Provider" versus  
"Location" Portability Conundrum**

One of the substantive legal and significant operational challenges to the *Wireline-Wireless Porting Order* is the obligation on local exchange carriers to port a wireline number to a wireless carrier that allows the mobile subscriber to use the number outside the boundaries of the original rate center. It is an obligation that is imposed on Petitioners without compensation. Such an obligation would be considered "location" porting. In the *First Report and Order*<sup>15</sup> the FCC ruled that carriers would not be required to provide location portability. The FCC in *The Wireline-Wireless Porting Order*, *supra*, at paragraph 28 clearly allows location porting. Under the Administrative Procedure Act this is rulemaking and must be preceded by notice in the Federal Register - *see* 5 USC § 553(b).

This decision will be subject to many legal challenges. Until the uncertainty surrounding

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<sup>15</sup> *First Report and Order and Further Notice of Proposed Rulemaking, Telephone Number Portability*, 11 FCC Rcd at 8443.

the implementation of wireline-to-wireless porting is resolved the obligations of LECs are unclear, and subject to the erroneous interpretation that they are obligated to implement a version of number portability is not required by the Act or applicable FCC rules. The CMRS providers' requests appear to seek wireline-to-wireless number porting without any conditions regarding the geographic limitations for number utilization.

Section 251(b) (2) of the Act requires all LECs to "provide to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission."<sup>16</sup> The Act defines number portability as "the ability of users of telecommunication services to retain, *at the same location*, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another."<sup>17</sup> In promulgating its number portability rules, the FCC cited this definition and determined that the Act requires *service provider portability but not location portability*.<sup>18</sup> The FCC defined "service provider portability" as "the ability of end users to retain the same telephone numbers (that is, the same NPA and NXX codes and the same line numbers) when changing from one service provider to another."<sup>19</sup> In contrast, "location portability" is "the ability of end users to retain the same telephone numbers *when moving* from one location to

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<sup>16</sup> 47 U.S.C. §251(b)(2).

<sup>17</sup> 47 U.S.C. §153(30) (emphasis added).

<sup>18</sup> See *In the Matter of Telephone Number Portability, First Report and Order and Further Notice of Proposed Rulemaking*, in CC Docket No. 95-116 (rel. July 2, 1996) 11 FCC rcd 8352, 8447 (Number Portability Decision)

<sup>19</sup> *In the Matter of Telephone Number Portability, Notice of Proposed Rulemaking*, 10 FCC Rcd 12350, 12355 (1995).

another, either within the area served by the same central office or between areas served by central offices.”<sup>20</sup>

In its *Number Portability Decision*, the FCC determined that mandating carriers to implement geographic *location portability was not in the public interest*.<sup>21</sup> As part of this decision, the FCC noted its concerns regarding the significant implementation issues arising from location portability. Specifically, the FCC found that, among other reasons, imposing location portability at this time would cause consumer confusion by the loss of the geographic identity of the telephone number. As a result, customers would not know whether they were making a call to a nearby location or to a distant location, and may not know whether the call would be subjected to toll charges.<sup>22</sup> With the change in location, LECs’ service offerings, switching, and routing of originating calls to the ported number would need to be changed.<sup>23</sup> The FCC also noted that commenting parties observed that location portability would create unnecessary and burdensome costs on carriers and on directory assistance, operator, and

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<sup>20</sup> *Id.* at 12356 (emphasis added).

<sup>21</sup> *Number Portability Decision*, 11 FCC Rcd at 8449. The FCC also determined that it may decide to mandate implementation of geographic location portability in the future “if it would be in the public interest” and noted that carriers may provide geographic location portability “consistent with this Order” if they so choose. *Id.* at 8447. The FCC has not done so and the Petitioner is not aware of any LEC that has purposefully implemented ubiquitous geographic location portability.

<sup>22</sup> *Id.* at 8448.

<sup>23</sup> *See id.* at 8446-8447 (citing the New York Department of Public Service’s observation that the only way to avoid the customer confusion which would result from location portability was to limit location portability to a rate center).

emergency services providers.<sup>24</sup> None of these public interest considerations have changed since the *Number Portability Decision*, *supra*.

The Commission should grant this Petition to ensure that Petitioners' end user customers do not pay for unnecessary and undesired costs associated with implementation of uncertain requirements. For some of Wisconsin's small telephone companies the LNP implementation is in the hundreds of thousands of dollars.

### **III. Grant of this Request is Required in the Public Interest**

#### **A. Section 251(f)(2) of the Act Empowers the State Commission to Ensure that this Uncertainty does not Adversely Impact the Public Interest**

The Act vests the Commission with authority to balance the requests for wireline-wireless number portability with the potential harmful public interest consequences. While the Act imposes on all LECs obligations of interconnection such as resale, number portability, dialing parity, access to rights of way and reciprocal compensation,<sup>25</sup> Congress wisely invested the Commission with the authority to suspend or modify these obligations for LECs "with fewer than two percent of the Nation's subscriber lines installed in the aggregate nationwide" if the Commission determines that such suspension or modification

- (A) is necessary –
  - (i) to avoid a significant adverse economic impact on users of telecommunications services generally;
  - (ii) to avoid imposing a requirement that is unduly economically burdensome; or

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<sup>24</sup> *Id.* at 8444-8445.

<sup>25</sup> *See generally* 47 U.S.C. § 251(b).

- (iii) to avoid imposing a requirement that is technically infeasible; and
- (B) is consistent with the public interest, convenience, and necessity.<sup>26</sup>

As demonstrated in Sections II.A and B, *supra*, the Petitioners are eligible to seek the relief requested herein from the Commission. Similarly, and subject to its findings with respect to the specific statutory directives, the Commission is authorized to grant such relief. Action by the Commission will bring certainty and rationality to the instant situation and will avoid the wasteful expenditure of human and monetary resources pending the development of identified federal requirements, specifically tailored to address LECs' obligations with respect to wireline-to-wireless portability and the documented implementation problems associated therewith. As demonstrated below, the necessary criteria are satisfied for a Commission finding that grant of this Petition is warranted.

**B. Section 251(f)(2)'s Criteria for Granting the Relief Sought are Met**

**1. Section 251(f)(2)(A)'s "avoidance" criteria are met**

A grant of this Petition will avoid a significant adverse economic impact on users of telecommunications services generally. As demonstrated herein and in the Attachments, the costs of implementing the number portability are significant, not only with respect to the deployment of the hardware and software necessary to achieve porting capability, but also with respect to ongoing data costs and administration processes, and the establishment of the proper arrangements among the affected carriers.

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<sup>26</sup> 47 U.S.C. § 251 (f) (2).



Initial and on-going costs incurred to satisfy the request of the CMRS provider ultimately are recovered through charges paid by each of the Petitioners' customers. Compounding the adverse effect of this result is the fact that most of these customers will receive no benefit from the provision of the wireline-to-wireless number portability while paying substantially for LNP. The ILEC Division is not aware of any Petitioners receiving a request from a customer seeking to disconnect his/her wireline service and have his/her number ported to a CMRS provider. Accordingly, all of the subscribers of each Petitioner would be adversely impacted by an increase in rates in order to accommodate the request of the CMRS provider.<sup>27</sup>

Second, a grant of a temporary suspension would avoid imposing a requirement that is unduly economically burdensome. As a small telephone company, each Petitioner has a limited customer base over which to spread its costs.<sup>28</sup> As noted herein, these costs are significant. The decision to incur them becomes even more difficult to justify when weighed against the few, if any, public benefits that may be gained by attempting to implement the capability to port numbers to the CMRS provider. The same balancing of competing interests was addressed previously and the decision was made that smaller LECs, like the Petitioners, need not expend scarce resources.

When the FCC initially promulgated its number portability rules, it determined that

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<sup>27</sup> See also *Number Resource Decision*, 17 FCC Rcd at 262 (Imposing the cost of implementing the technology for number pooling, which is the same technology that is used to implement number portability on smaller and rural carriers "may delay efforts to bring advanced services to rural subscribers").

<sup>28</sup> See id. at 262 (The per line cost of implementing the technology for number pooling, which is the same technology that is used to implement number portability would "be significantly higher for small and rural carriers operating outside of the largest 100 MSAs than for carriers operating inside urban and metropolitan areas because of these carriers' limited customer bases").

requiring rural LECs to provide number portability where no competitor has requested such function would “burden rural LECs significantly without benefiting the public by increasing competition.”<sup>29</sup> Accordingly, the FCC determined to limit deployment of portability “to those switches for which a competitor has expressed interest in deployment.”<sup>30</sup> The FCC further found that if competition is not imminent in the areas covered by rural/smaller LEC switches, “then the rural or smaller LEC will not receive requests from competing carriers to implement portability, and thus will not need to expend its resources, until competition actually develops in its service area.”<sup>31</sup> In many instances, to the best of Petitioners knowledge, the requesting CMRS providers are not providing a telecommunications service within Petitioners’ service area.

To many of the Petitioner’s knowledge and belief the requesting CMRS provider is not providing a telecommunications service within Petitioner’s service area.

Finally, grant of the temporary suspension would avoid imposing a requirement that is technically infeasible, at least within the time frame of the Order. While installation of the necessary equipment to achieve portability can technically be accomplished, implementation of that capability does not, absent the establishment of terms and conditions with the CMRS provider, address all of the potential technical or implementation issues. The resolution of these

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<sup>29</sup> *Number Portability Reconsideration*, 12 FCC Rcd at 7298-99, 7301.

<sup>30</sup> *Id.* at 7301; *see also* 47 C.F.R. §52.23(c) (“Beginning January 1, 1999, all LECs must make a long-term database method for number portability available within six months after a specific request by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate”).

<sup>31</sup> *In the Matter of Numbering Resource Optimization; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996: Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-20*, 17 FCC Rcd 252, 262 (2001).

issues, however, can be established only through the process of negotiating a porting agreement, a process that the CMRS providers have not sought with most, if not all, the Petitioners.

**2. Section 251(f)(2)(B)'s requirement is met –  
grant of the temporary suspension would  
serve the public interest**

Section 251(f)(2)(B) provides that the Commission is to determine that the requested suspension “is consistent with the public interest, convenience and necessity.”<sup>32</sup> By granting the temporary suspension, the Commission would avoid the potential waste of resources or, at the very least, diminish the waste that would occur in the absence of the resolution of the challenges to and the further rulemaking proceedings of the FCC’s *Wireline-Wireless Porting Order* clarifying issues related to wireline-to-wireless number portability. The Commission could ensure that number portability is implemented in a manner consistent with known and documented procedures pursuant to an agreement that clearly defines the rights and responsibilities of the two parties involved – the Petitioner and the CMRS provider. Ultimately, however, since the costs associated with all of the uncertainty associated with this issue would be recovered through charges to customers, the public interest would be served by eliminating such costs and the associated recovery from end users until the significant issues are finally resolved in the wireline-to-wireless number portability conundrum. This is particularly true because of the lack of customer interest in such porting in the rural areas served by the Petitioners.

**IV. Immediate Suspension Pending Consideration of this  
Petition is Warranted and Necessary to Serve the Public Interest**

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<sup>32</sup> 47 U.S.C. § 251(f)(2)(B).

Section 251(f)(2) provides that the Commission is to act on this instant Petition within 180 days.<sup>33</sup> Pending such action, the Commission “may suspend enforcement of the requirement or requirements to which the petition applies with respect to the petitioning carrier or carriers.”<sup>34</sup> In its *Number Portability Reconsideration*, the FCC cited this provision and noted that if State commissions exercise this authority, “eligible LECs will have sufficient time to obtain any appropriate Section 251(f)(2) relief as provided by the statute.”<sup>35</sup>

Suspension of enforcement, while the petition is pending, would allow rational public policy decision-making without a “rush-to-judgment” based on the impending November 24, 2003 and May 24, 2004 deadlines. Should the FCC conclude its deliberations *Wireline-Wireless Porting Order* and the courts’ ruling on the legal challenges to that Order within this period of time, the guidance provided may assist the Commission, Petitioners and CMRS providers in addressing and resolving the issues raised in this Petition. Accordingly, suspension of the obligation while the petition is pending would provide necessary time to obtain federal guidance on these issues, thus preserving valuable resources and avoiding unnecessary expenditures.<sup>36</sup>

## V. Conclusion

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<sup>33</sup> 47 U.S.C. § 251(f)(2).

<sup>34</sup> *Id.*

<sup>35</sup> *Number Portability Reconsideration*, 12 FCC Rcd at 7302-03.

<sup>36</sup> See “Senate Shelves LNP Amendment,” *Wireless Week*, Sept. 5, 2003 ed. (reporting that Congress admonished the FCC “to complete implementation details for wireline-to-wireless portability”).

For the reasons demonstrated herein, the Commission action requested in this Petition will not only serve the public interest, but will enable the Commission to assert its proper role of ensuring that the interest of the public, and in particular, rural end users served by the Petitioners are not adversely affected. Moreover, by immediately suspending any requirement for the Petitioners to provide number portability to a requesting CMRS provider as specifically provided for by Section 251(f)(2), the Commission can ensure that any waste of resources is minimized while the FCC and this Commission sort through the issues raised herein.

Accordingly, the Petitioners respectfully request that the Commission grant this Petition.

ILEC DIVISION OF THE WISCONSIN STATE  
TELECOMMUNICATIONS ASSOCIATION



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Ray J. Riordan  
Attorney for the ILEC Division of the Wisconsin  
State Telecommunications Association  
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Madison, WI 53719  
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**Attachment 1**

**AMERY TELCOM, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Amery Telcom, Inc. (Amery) with its principle place of business at 120 Birch Street West, Amery WI 54001 operates the Deer Park exchange (Deer Park) with 422 access lines in the State of Wisconsin. Amery is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Amery's access lines are far below the 2% threshold of 3.76 million access lines.

Deer Park provides service to customers in portions of St. Croix and Polk counties. Deer Park has one remote switch. The Deer Park rate center is located within the largest 100 metropolitan statistical areas.

Deer Park's service area is rural. The service territory encompasses areas that are sparsely populated. Deer Park serves only 15 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 20 times more dense than Deer Park's. This reflects the sparse population of the Deer Park's service area.

**A. Technical and Economic Impacts**

At this time the Deer Park exchange does not provide Local Number Portability (LNP) to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. The request for LNP from Verizon Wireless is the only LNP request. It is believed the request was mailed on September 5, 2003.

It is the undersigned belief that the host switch serving Deer Park cannot be upgraded to provide LNP. We estimate that a new switch for providing LNP will cost a minimum of \$1,000,000. This is over \$2,300.00 per access line. These costs must be paid by our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for use of the LNP database, personnel, trunking and other related networking. These expenses will further raise the cost to the ratepayer.

Moreover, it would take well over a year to purchase, install and test the switch. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Amery does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Amery determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

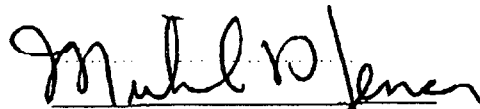
Amery received the request to implement wireline to wireless portability by November 24, 2003. The request received from Verizon Wireless was insufficient for the following reasons:

- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Amery to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Amery's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Verizon Wireless does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Verizon Wireless does not provide service in our service territory. The fact that Verizon Wireless does not have a presence in Amery's rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Verizon Wireless and Amery, which we believe indicates that it does not operate or plan to operate within our area.

(5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Amery to Verizon Wireless. Without that information Amery does not know how to provide LNP porting. The fact that Verizon Wireless does not have a presence in the Deer Park rate center further exacerbates the LNP technical problems.

I, Michael D. Jensen, President and General Manager of Amery Telcom, Inc. (Amery), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding Amery is true and accurate to the best of my knowledge, information, and belief.

Date: 11/06/03

  
Michael D. Jensen  
President and General Manager



Attachment **2**

**AMHERST TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Amherst Telephone Company (Amherst) with its principle place of business at 120 Mill Street, Amherst WI 54406 operates 5,432 access lines in the State of Wisconsin. Amherst is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access line count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Amherst's access lines are far below the 2% threshold of 3.76 million access lines.

Amherst provides service to customers in portions of the following counties: Portage, Marathon and Waupaca. Amherst has three rate centers deployed in its host/remote switching configurations. Amherst's rate centers are not located within the largest 100 metropolitan statistical areas.

Amherst's service area is rural. The service territory encompasses areas that are sparsely populated. Amherst serves only 22 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 13 times more dense than Amherst's. This reflects the sparse population of Amherst's service area.

**A. Technical and Economic Impacts**

At this time Amherst does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Amherst has only received requests for LNP from Sprint PCS and Verizon Wireless.

Amherst contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$22,443 for the necessary upgrades required to comply with the request that had been received and activation and setup of system is estimated to be \$11,000. This is over \$6.00 per customer. These costs, as I understand, are paid through surcharges on our customers. There are additional charges that we have been unable to calculate partially because of the limited information we

received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking, other related networking and manufacturer feature turn on assistance. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take 60 days from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially addresses the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Amherst does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Amherst determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Amherst received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

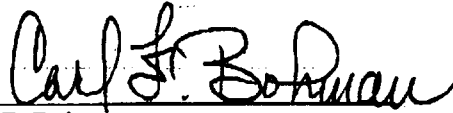
- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Amherst to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Amherst's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in Amherst's rate centers is another indication that they do

not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS and Verizon Wireless or Amherst, which we believe indicates that they do not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Amherst to Sprint PCS and Verizon Wireless. Without that information Amherst does not know how to provide LNP porting. The fact that Sprint PCS and Verizon Wireless do not have a presence in Amherst's rate centers further exacerbates the LNP technical problems.

I, Carl F. Bohman, Manager of Amherst Telephone Company (Amherst), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11/04/2003



Carl F. Bohman  
General Manager

**Attachment 3**

**CHEQUAMEGON COMMUNICATIONS COOPERATIVE, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Chequamegon Communications Cooperative, Inc. (Chequamegon) with its principle place of business at 43705 U.S. Highway 63, Cable WI 54821 operates 10,461 access lines in the State of Wisconsin. Chequamegon is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Chequamegon's access lines are far below the 2% threshold of 3.76 million access lines.

Chequamegon provides service to customers in portions of the following counties: Bayfield, Ashland and Douglas. Chequamegon has thirteen rate centers deployed in its host/remote switching configurations. Chequamegon's rate centers are not located within the largest 100 metropolitan statistical areas.

Chequamegon's service area is rural. The service territory encompasses areas that are sparsely populated. Chequamegon serves only 8 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 37 times more dense than Chequamegon's. This reflects the sparse population of Chequamegon's service area.

**A. Technical and Economic Impacts**

At this time Chequamegon does not provide Local Number Portability to any commercial mobile radio service provider, but does provide to a competitive local exchange carrier in one CenturyTel exchange. Chequamegon has only received a request for LNP from on CMSR, Sprint PCS.

Chequamegon contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost in excess of \$20,000 for the necessary upgrades required to comply with the request that had been received. This is over \$1.90 per access line. These costs, as I understand, are paid through

surcharges on our customers. Monthly recurring costs are estimated at over \$1,200 or approximately \$15,000 annually. This is almost \$150 per access line. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take approximately 90 days from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Chequamegon does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Chequamegon determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

Chequamegon received the request to implement wireline to wireless portability by November 24, 2003. The request received from Sprint PCS was insufficient for the following reasons:

- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Chequamegon to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Chequamegon's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS does not provide service in our service territory. The fact that Sprint PCS does not have a presence in Chequamegon's

rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS and Chequamegon, which we believe indicates that it does not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Chequamegon to Sprint PCS. Without that information Chequamegon does not know how to provide LNP porting. The fact that Sprint PCS does not have a presence in Chequamegon's rate centers further exacerbates the LNP technical problems.

I, David Carter, General Manager of Chequamegon Communications Cooperative, Inc. (Chequamegon), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding Chequamegon is true and accurate to the best of my knowledge, information, and belief.

Date: 11/10/03

Don Anderson Asst. GM signing for  
David Carter  
General Manager Dave Carter

Attachment 4

**BAYLAND TELEPHONE, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Bayland Telephone, Inc. (Bayland) with its principle place of business at 2711 E. Frontage Road, Abrams WI 54101 operates 2,484 access lines in the State of Wisconsin. Bayland is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Bayland's access lines are far below the 2% threshold of 3.76 million access lines.

Bayland provides service to customers in portions of Oconto County. Bayland has one rate center with a single switch. Bayland's rate center is not located within the largest 100 metropolitan statistical areas.

Bayland's service area is rural. The service territory encompasses areas that are sparsely populated. Bayland serves only 28 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 10 times more dense than Bayland's. This reflects the sparse population of Bayland's service area.

**A. Technical and Economic Impacts**

At this time Bayland does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Bayland has only received a request for LNP from Sprint PCS:

Bayland contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$9,000 for the necessary upgrades required to comply with the request that had been received. This is almost \$3.62 per customer. These costs, as I understand, are paid through surcharges on our customers. A vendor for providing local number portability service order administration and personnel costs has estimated those annual costs are \$13,420. This adds \$5.40 annual to our ratepayer charges. There are additional costs that we have been unable to calculate partially

because of the limited information we received from the CMRS provider. These costs include finance costs, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take approximately 30 days from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Bayland does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Bayland determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

Bayland received the request to implement wireline to wireless portability by November 24, 2003. The request received from Sprint PCS was insufficient for the following reasons:

- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Bayland to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Bayland's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS does not provide service in our service territory. The fact that Sprint PCS does not have a presence in Bayland's rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS and Bayland, which we



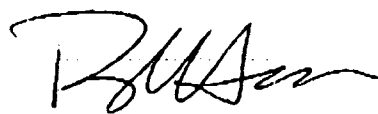
believe indicates that it does not operate or plan to operate within our area.

(5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Bayland to Sprint PCS. Without that information Bayland does not know how to provide LNP porting. The fact that Sprint PCS does not have a presence in Bayland's rate centers further exacerbates the LNP technical problems.

I, Roger Hermesen, President & General Manager of Bayland Telephone, Inc. (Bayland), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding Bayland is true and accurate to the best of my knowledge, information, and belief.

Date:

11-5-03



Roger Hermesen  
President & General Manager

Attachment 5

**INDIANHEAD TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Indianhead Telephone Company (Indianhead) with its principle place of business at N3767 4<sup>th</sup> Street, Weyerhaeuser WI 54895 operates 2,373 access lines in the State of Wisconsin. Indianhead is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access line count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Indianhead's access lines are far below the 2% threshold of 3.76 million access lines.

Indianhead provides service to customers in portions of the following counties: Rusk and Sawyer. Indianhead has three rate centers deployed in its host/remote switching configurations. Indianhead's rate centers are not located within the largest 100 metropolitan statistical areas.

Indianhead's service area is rural. The service territory encompasses areas that are sparsely populated. Indianhead serves only 6 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 50 times more dense than Indianhead's. This reflects the sparse population of Indianhead's service area.

**A. Technical and Economic Impacts**

At this time Indianhead does not provide Local Number Portability (LNP) to any commercial mobile radio service (CMRS) provider. Indianhead does provide LNP to a competitive landline local exchange carrier. Indianhead has only received one CMRS request for LNP from Sprint PCS.

Indianhead contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the number porting environment for CMRS providers. Based on those discussions, we were told by our switch vendor that it would cost \$12,000 plus \$4.00 a line or approximately \$21,500 for the necessary upgrades required to comply with the request that has been received. This is over \$9.00 per access line. These costs, as I understand, are paid through surcharges on our customers. There

are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for use of the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Indianhead does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Indianhead determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

Indianhead received the request to implement wireline to wireless portability by November 24, 2003. The request received from Sprint PCS was insufficient for the following reasons:

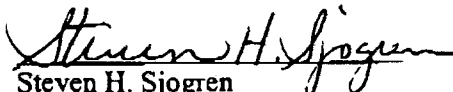
- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Indianhead to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Indianhead's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS does not provide service in our service territory. The fact that Sprint PCS does not have a presence in Indianhead's rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions

for the local interconnection in place between Sprint PCS and Indianhead, which we believe indicates that it does not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Indianhead to Sprint PCS. Without that information Indianhead does not know how to provide LNP porting. The fact that Sprint PCS does not have a presence in Indianhead's rate centers further exacerbates the LNP technical problems.

I, Steven H. Sjogren, President of Indianhead Telephone Company (Indianhead), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding Indianhead is true and accurate to the best of my knowledge, information, and belief.

Date: Nov. 21, 2003

  
Steven H. Sjogren  
President

Attachment 6

**BLOOMER TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Bloomer Telephone Company (Bloomer) with its principle place of business at 1120 15<sup>th</sup> Avenue, Bloomer WI 54724 operates 3,616 access lines in the State of Wisconsin. Bloomer is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Bloomer's access lines are far below the 2% threshold of 3.76 million access lines.

Bloomer provides service to customers in portions of the following counties: Chippewa and Dunn. Bloomer has one rate center with a single switch. Bloomer's rate center is not located within the largest 100 metropolitan statistical areas.

Bloomer's service area is rural. The service territory encompasses areas that are sparsely populated. Bloomer serves only 27 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 11 times more dense than Bloomer's. This reflects the sparse population of Bloomer's service area.

**A. Technical and Economic Impacts**

At this time Bloomer does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Bloomer has only received a request for LNP from Sprint PCS.

Bloomer contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$15,300 for the necessary upgrades required to comply with the request that had been received. This is almost \$4.25 per access line. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for use of the LNP database, personnel, trunking and other related

networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take approximately four weeks from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Bloomer does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Bloomer determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

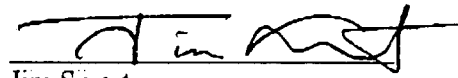
Bloomer received the request to implement wireline to wireless portability by November 24, 2003. The request received from Sprint PCS was insufficient for the following reasons:

- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Bloomer to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Bloomer's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Bloomer to Sprint PCS. Without that information Bloomer does not know how to provide LNP porting. The fact that Sprint PCS does not have a presence in Bloomer's rate centers further exacerbates the LNP technical problems.

I, Jim Smart, Manager of Bloomer Telephone Company (Bloomer), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the

information contained therein regarding Bloomer is true and accurate to the best of my knowledge, information, and belief.

Date: 11/5/03

A handwritten signature in black ink, appearing to read "Jim Smart", written over a horizontal line.

Jim Smart  
Manager

**ATTACHMENT 7**

**COCHRANE COOPERATIVE TELEPHONE COMPANY, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Cochrane Cooperative Telephone Company, Inc. (Cochrane) with its principle place of business 103 West 5<sup>th</sup> St., Cochrane WI 54622 operates 1,454 access lines in the State of Wisconsin. Cochrane is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Cochrane's access lines are far below the 2% threshold of 3.76 million access lines.

Cochrane provides service to customers in Buffalo county. Cochrane has two rate centers deployed in its host/remote switching configurations. None of Cochrane's rate centers are located within the largest 100 metropolitan statistical areas.

Cochrane's service area is rural. **The service territory encompasses areas that are sparsely populated.** Cochrane serves only 27 access lines per square mile of service territory. SBC, Wisconsin's largest incumbent local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC's access lines are over 11 times more dense than Cochrane's. This reflects the sparse population of Cochrane's service area.

**A. Technical and Economic Impacts**

At this time Cochrane does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier or any other telecommunications provider. Cochrane has only received requests for LNP from Sprint PCS and Verizon Wireless.

Cochrane contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$500,000 for the necessary upgrades, switch changes and other start-up costs required to comply with the request that had been received. This exceeds \$340.00 per customer. These costs, as I understand, are paid through surcharges on our customers. There are additional that we have



been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take approximately 60 to 90 days from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Cochrane does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Cochrane determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

Cochrane received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless was insufficient for the following reasons:

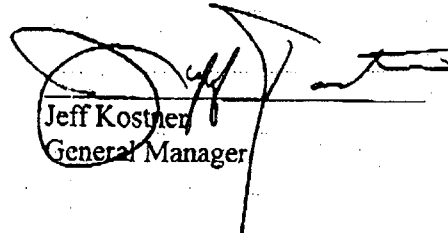
- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Cochrane to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Cochrane's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required by statute and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide

service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in Cochrane's rate centers is another indication that it does not "plan to operate" within our area. There are no interconnection agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS and Verizon Wireless and Cochrane, which we believe indicates that they do not plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Cochrane to Sprint PCS and Verizon Wireless. Without that information Cochrane does not know how to provide LNP porting. The fact that Sprint PCS and Verizon Wireless do not have a presence in Cochrane's rate centers further exacerbates the LNP technical problems.

I, Jeff Kostner, General Manager of Cochrane Cooperative Telephone Company, Inc. (Cochrane), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and this attachment and that the information contained in both regarding Cochrane is true and accurate to the best of my knowledge, information, and belief.

Date: 10-31-03

  
Jeff Kostner  
General Manager

**Attachment 8**

**COON VALLEY FARMERS TELEPHONE COMPANY, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Coon Valley Farmers Telephone Company, Inc. (Coon Valley) with its principle place of business at 105 Central Avenue, Coon Valley WI 54623 operates 2,610 access lines in the State of Wisconsin. Coon Valley is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Coon Valley's access lines are far below the 2% threshold of 3.76 million access lines.

Coon Valley provides service to customers in portions of the following counties: Vernon, La Crosse and Monro. Coon Valley has three rate centers deployed in its host/remote switching configurations. Coon Valley's rate centers are not located within the largest 100 metropolitan statistical areas.

Coon Valley's service area is rural. The service territory encompasses areas that are sparsely populated. Coon Valley serves only 19 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 15 times more dense than Coon Valley's. This reflects the sparse population of Coon Valley's service area.

**A. Technical and Economic Impacts**

At this time Coon Valley does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Coon Valley has only received requests for LNP from Sprint PCS and Verizon Wireless.

Coon Valley contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$900,000 to \$1,100,000 for a new switch because the present switch cannot be upgraded to provide local number portability and the necessary upgrades required to comply

with the request that had been received and, This is between \$340 and \$420 per access line. These costs will be paid through surcharges and rate increases on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take <sup>a minimum of 6 months</sup> from the initial order date to replace the switch and install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Coon Valley does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Coon Valley determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Coon Valley received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Coon Valley to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Coon Valley's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate.

To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in Coon Valley's rate centers is another indication that they do not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS and Verizon Wireless or Coon Valley, which we believe indicates that they do not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Coon Valley to Sprint PCS and Verizon Wireless. Without that information Coon Valley does not know how to provide LNP porting. The fact that Sprint PCS and Verizon Wireless do not have a presence in Coon Valley's rate centers further exacerbates the LNP technical problems.

I, Lenord Leis, Manager of Coon Valley Farmers Telephone Company, Inc. (Coon Valley), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date:

11-4-03

Lenord Leis

Lenord Leis  
Manager

Attachment **9**

**MANAWA TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Manawa Telephone Company (Manawa) with its principle place of business at 131 2<sup>nd</sup> Street, Manawa WI 54949 operates 2,676 access lines in the State of Wisconsin. Manawa is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Manawa's access lines are far below the 2% threshold of 3.76 million access lines.

Manawa provides service to customers in the following county: Waupaca. Manawa has two rate centers deployed in its host/remote switching configurations. Manawa's rate centers are not located within the largest 100 metropolitan statistical areas.

Manawa's service area is rural. The service territory encompasses areas that are sparsely populated. Manawa serves only 24 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 12 times more dense than Manawa's. This reflects the sparse population of Manawa's service area.

**A. Technical and Economic Impacts**

At this time Manawa does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Manawa has only received a request for LNP from Verizon Wireless. That request was dated on October 22, 2003.

Manawa contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$11,700 for the necessary upgrades required to comply with the request that has been received. I estimate the necessary testing will add another \$3,300. This cost is almost \$5.60 per access line. These costs, as I understand, are paid through surcharges on our customers. Verisign advises that the minimum monthly cost for accessing the LNP database is \$1,200 for Service Order

Administration and \$150 for dipping. This is \$16,200 annually or over \$6.00 an access line. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

It will not take a substantial amount of time from the initial order date to activate and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the issue.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Manawa does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Manawa determine its cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

Manawa received the request to implement wireline to wireless portability by November 24, 2003. The request received from Verizon Wireless was insufficient for the following reasons:

- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Manawa to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Manawa's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Verizon Wireless does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Verizon Wireless does not provide service in our service territory. The fact that Verizon Wireless does not have a presence in

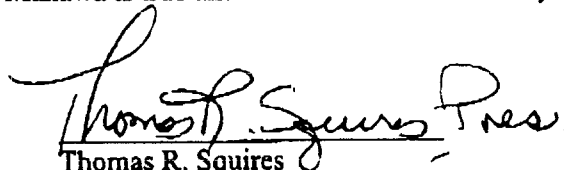
Manawa's rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Verizon Wireless and Manawa, which we believe indicates that it does not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Manawa to Verizon Wireless. Without that information Manawa does not know how to provide LNP porting. The fact that Verizon Wireless does not have a presence in Manawa's rate centers further exacerbates the LNP technical problems.

I, Thomas R. Squires, President of Manawa Telephone Company (Manawa), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding Manawa is true and accurate to the best of my knowledge, information, and belief.

Date:

11/7/03

  
Thomas R. Squires  
President



Attachment 10

**MARQUETTE ADAMS TELEPHONE COOPERATIVE, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Marquette Adams Telephone Cooperative, Inc. (Marquette Adams) with its principle place of business at 113 North Oxford St, Oxford, WI 53952 operates 4,261 access lines in the State of Wisconsin. Marquette Adams is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Marquette Adams' access lines are far below the 2% threshold of 3.76 million access lines.

Marquette Adams provides service to customers in portions of the following counties: Marquette and Adams. Marquette Adams has four rate centers deployed in its host/remote switching configurations. Marquette Adams' rate centers are not located within the largest 100 metropolitan statistical areas.

Marquette Adams' service area is rural. The service territory encompasses areas that are sparsely populated. Marquette Adams serves only 21 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 14 times more dense than Marquette Adams'. This reflects the sparse population of Marquette Adams' service area.

**A. Technical and Economic Impacts**

At this time Marquette Adams does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Marquette Adams has only received requests for LNP from Sprint PCS and Verizon Wireless.

Marquette Adams contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost up to \$160,000 for the necessary upgrades required to comply with the request that has been received. This is over \$37 per access line. These costs, as I understand, are paid through

surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take six months from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Marquette Adams does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Marquette Adams determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Marquette Adams received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

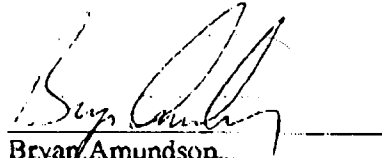
- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Marquette Adams to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Marquette Adams' original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do

not have a presence in Marquette Adams' rate centers is another indication that they do not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS or Verizon Wireless and Marquette Adams, which we believe indicates that they do not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Marquette Adams to Sprint PCS and Verizon Wireless. Without that information Marquette Adams cannot provision the switching, the network or setup billing arrangements for LNP to a wireless carrier. The fact that Sprint PCS and Verizon Wireless do not have a presence in Marquette Adams' rate centers further exacerbates the LNP technical problems.

I, Bryan Amundson, Manager of Marquette Adams Telephone Cooperative, Inc. (Marquette Adams), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11-5-03

  
Bryan Amundson  
Manager

Post-It™ brand fax transmittal memo 7671

# of pages = 3

To	Nick Rester	From	Chris Hegel
Co.	WSTA	Co.	Mosinee Telephone Co.
Dept.		Phone #	
Fax #		Fax #	

Attachment 11

**THE MOSINEE TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

The Mosinee Telephone Company (Mosinee) with its principle place of business at 410 4<sup>th</sup> Street, Mosinee WI 54455 operates 5459 access lines in the State of Wisconsin. Mosinee is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Mosinee's access lines are far below the 2% threshold of 3.76 million access lines.

Mosinee provides service to customers in portions of the following counties: Marathon and Portage. Mosinee has one rate center with a stand alone switch. Mosinee's rate center is not located within the largest 100 metropolitan statistical areas.

Mosinee's service area is rural. The service territory encompasses areas that are sparsely populated. Mosinee serves only 26 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 11 times more dense than Mosinee's. This reflects the sparse population of Mosinee's service area.

**A. Technical and Economic Impacts**

At this time Mosinee does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Mosinee has only received requests for LNP from Sprint PCS and Verizon Wireless.

The Mosinee Telephone Company contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost an estimated \$35,000 for the necessary upgrades required to comply with the request that has been received. We estimate additional startup costs will add \$5,000. This is over \$7 per access line. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs,

charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take four months from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Mosinee does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Mosinee determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Mosinee received the requests to implement wireline to wireless portability by November 24, 2003. The request from Verizon Wireless was received on October 31, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:


- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Mosinee to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Mosinee's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in Mosinee's rate centers is another indication that they do not operate or plan to operate within our area. While there is a reciprocal

compensation agreement between Mosinee and Sprint PCS, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS or Verizon Wireless and Mosinee, which we believe indicates that they do not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Mosinee to Sprint PCS and Verizon Wireless. Without that information Mosinee cannot provision the switching, the network or setup billing arrangements for LNP to a wireless carrier. The fact that Sprint PCS and Verizon Wireless do not have a presence in Mosinee's rate centers further exacerbates the LNP technical problems.

I, Mary Knoedler, President of The Mosinee Telephone Company (Mosinee), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: NOV 07 2003

  
Mary Knoedler  
President

Attachment 12

**LAVALLE TELEPHONE COOPERATIVE, INC.  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

LaValle Telephone Cooperative, Inc. (LaValle) with its principle place of business at 108 W. Main St., LaValle WI 53941 operates 2,160 access lines in the State of Wisconsin. LaValle is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and LaValle's access lines are far below the 2% threshold of 3.76 million access lines.

LaValle provides service to customers in portions of the following counties: Richland, Vernon, Sauk and Juneau. LaValle has two rate centers deployed in its host/remote switching configurations. LaValle's rate centers are not located within the largest 100 metropolitan statistical areas.

LaValle's service area is rural. The service territory encompasses areas that are sparsely populated. LaValle serves slightly more than 17 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 17 times more dense than LaValle's. This reflects the sparse population of LaValle's service area.

**A. Technical and Economic Impacts**

At this time LaValle does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. LaValle has only received a request for LNP from Verizon Wireless.

LaValle currently has LNP software loaded on its switching platform. Because LaValle has not received a request from a carrier, the actual cost of implementation is not known. There are other additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for use of the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, LaValle does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can LaValle determine its cost of providing LNP without this information.

**B. The Request for Porting Numbers to a Wireless Provider**

LaValle received the request to implement wireline to wireless portability by November 24, 2003. The request from Verizon Wireless was received on October 29, 2003. The request received from Verizon Wireless was insufficient for the following reasons:

- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate LaValle to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of LaValle's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Verizon Wireless does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Verizon Wireless does not provide service in our service territory. The fact that Verizon Wireless does not have a presence in LaValle's rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Verizon Wireless and LaValle, which we believe indicates that it does not operate or plan to operate within our area.
- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from LaValle to Verizon Wireless. Without that information LaValle does not know how to provide LNP porting. The fact that

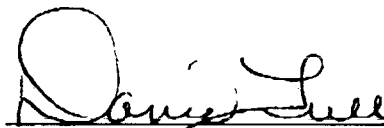


Verizon Wireless does not have a presence in LaValle's rate centers further exacerbates the LNP technical problems.

I, David Lull, General Manager of LaValle Telephone Cooperative, Inc. (LaValle), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding LaValle is true and accurate to the best of my knowledge, information, and belief.

Date:

11/10/03

  
David Lull  
General Manager

Attachment **13**

**NELSON TELEPHONE COOPERATIVE'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Nelson Telephone Cooperative (Nelson) with its principle place of business at 318 Third Ave. West, Durand WI 54736 operates 4,287 access lines in the State of Wisconsin. Nelson is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Nelson's access lines are far below the 2% threshold of 3.76 million access lines.

Nelson provides service to customers in portions of the following counties: Pepin, Pierce, Buffalo and Dunn. Nelson has four rate centers deployed in its host/remote switching configurations. Nelson's rate centers are not located within the largest 100 metropolitan statistical areas.

Nelson's service area is rural. The service territory encompasses areas that are sparsely populated. Nelson serves only 12 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 25 times more dense than Nelson's. This reflects the sparse population of Nelson's service area.

**A. Technical and Economic Impacts**

At this time Nelson does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Nelson has only received requests for LNP from Sprint PCS and Verizon Wireless.

Nelson contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost up to \$40,000 for the necessary upgrades required to comply with the request that has been received. Additional cost for additional equipment (translations etc.) is estimated at \$5,000. This is \$10.50 per access line. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been

unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

We do not have an estimate amount of time it would take from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Nelson does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Nelson determine its total cost of providing LNP without this information.

**B. The Requests for Porting Numbers to a Wireless Provider**

Nelson received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Nelson to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Nelson's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory.

The fact that Sprint PCS and Verizon Wireless do not have a presence in Nelson's rate centers is another indication that they do not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS or Verizon Wireless and Nelson, which we believe indicates that they do not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Nelson to Sprint PCS and Verizon Wireless. Without that information Nelson cannot provision the switching, the network or setup billing arrangements for LNP to a wireless carrier. The fact that Sprint PCS and Verizon Wireless do not have a presence in Nelson's rate centers further exacerbates the LNP technical problems.

I, Christy Berger, General Manager and Executive Vice President of Nelson Telephone Cooperative (Nelson), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11/5/03

Christy Berger  
Christy Berger  
General Manager and  
Executive Vice President

Attachment 14

**RICHLAND-GRANT TELEPHONE COOPERATIVE, INC.  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Richland-Grant Telephone Cooperative, Inc. (Richland-Grant) with its principle place of business at 202 N. East St., Blue River WI 53518 operates 2,940 access lines in the State of Wisconsin. Richland-Grant is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Richland-Grant's access lines are far below the 2% threshold of 3.76 million access lines.

Richland-Grant provides service to customers in portions of the following counties: Grant, Richland, Crawford and Vernon. Richland-Grant has five rate centers deployed in its host/remote switching configurations. Richland-Grant's rate centers are not located within the largest 100 metropolitan statistical areas.

Richland-Grant's service area is rural. The service territory encompasses areas that are sparsely populated. Richland-Grant serves less than 11 access lines per square mile of service territory. In comparison SBC, Wisconsin's largest local exchange carrier (ILEC) serves over 300 access lines per square mile. SBC access lines are over 27 times more dense than Richland-Grant's. This reflects the sparse population of Richland-Grant's service area.

**A. Technical and Economic Impacts**

At this time Richland-Grant does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Richland-Grant has only received a request for LNP from Verizon Wireless.

Richland-Grant currently has LNP software loaded on its switching platform. Because Richland-Grant has not received a request from a carrier, the actual cost of implementation is not known. There are other additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for use of the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Richland-Grant does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Richland-Grant determine its cost of providing LNP without this information.

**B. The Request for Porting Numbers to a Wireless Provider**

Richland-Grant received the request to implement wireline to wireless portability by November 24, 2003. The request from Verizon Wireless was received on October 29, 2003. The request received from Verizon Wireless was insufficient for the following reasons:

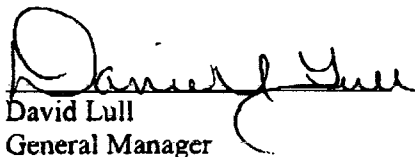
- (1) The request failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The request failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the request did not provide location routing numbers or point codes.
- (3) The request seeks to obligate Richland-Grant to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Richland-Grant's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Verizon Wireless does not have a presence in our rate centers indicates it desires "location" or "geographic" portability.
- (4) The request failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Verizon Wireless does not provide service in our service territory. The fact that Verizon Wireless does not have a presence in Richland-Grant's rate centers is another indication that it does not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Verizon Wireless and Richland-Grant, which we believe indicates that it does not operate or plan to operate within our area.
- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Richland-Grant to Verizon Wireless. Without that information Richland-Grant does not know how to provide LNP porting. The fact

that Verizon Wireless does not have a presence in Richland-Grant's rate centers further exacerbates the LNP technical problems.

I, David Lull, General Manager of Richland-Grant Telephone Cooperative, Inc. (Richland-Grant), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and that the information contained therein regarding Richland-Grant is true and accurate to the best of my knowledge, information, and belief.

Date:

11/10/03

  
David Lull  
General Manager

Attachment 15

**STATE LONG DISTANCE TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

State Long Distance Telephone Company (State Long Distance) with its principle place of business 216 W. Walworth St., Elkhorn WI 53121 operates 11,206 access lines in the State of Wisconsin. State Long Distance is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access line count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and State Long Distance's access lines are far below the 2% threshold of 3.76 million access lines.

State Long Distance provides service to customers in Walworth county. State Long Distance has two rate centers deployed in its two switching configurations. None of State Long Distance's rate centers are located within the largest 100 metropolitan statistical areas.

State Long Distance's service area is rural. Its access lines per square mile of service territory are 149 compared to SBC, Wisconsin's largest local exchange carrier, which serves over 300 access lines per square mile. State Long Distance customer density is less than half that of SBC.

**A. Technical and Economic Impacts**

At this time State Long Distance does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier or any telecommunications provider. State Long Distance has only received requests for LNP from Sprint PCS and Verizon Wireless.

State Long Distance contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$400,000 for the necessary upgrades, switch changes and other start-up costs required to comply with the request that had been received. This exceeds \$35.00 per customer.



These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS providers. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take approximately 60 to 90 days from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, State Long Distance does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can State Long Distance determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to Wireless Providers**

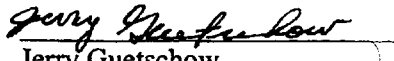
State Long Distance received two requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate State Long Distance to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of State Long Distance's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required by statute and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.

- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, neither Sprint PCS or Verizon Wireless provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in State Long Distance's rate centers is another indication that it does not operate or plan to operate within our area. While there are reciprocal compensation agreements between State Long Distance and each of the wireless carriers, there are no interconnection agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS or Verizon Wireless and State Long Distance, which we believe indicates that they do not plan to operate within our area.
- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from State Long Distance to Sprint PCS or Verizon Wireless. Without that information State Long Distance does not know how to provide LNP porting. The fact that Sprint PCS and Verizon Wireless do not have a presence in State Long Distance's rate centers further exacerbates the LNP technical problems.

I, Jerry Guetschow, Secretary and Treasurer of State Long Distance Telephone Company (State Long Distance), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained regarding State Long Distance is true and accurate to the best of my knowledge, information, and belief.

Date: November 7, 2003

  
Jerry Guetschow  
Secretary and Treasurer

Attachment 16

**TRI-COUNTY TELEPHONE COOPERATIVE INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Tri-County Telephone Cooperative Inc. (Tri-County) with its principle place of business at 417 5<sup>th</sup> Avenue North, Strum, WI 54770 operates 4,314 access lines in the State of Wisconsin. Tri-County is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Tri-County's access lines are far below the 2% threshold of 3.76 million access lines.

Tri-County provides service to customers in portions of the following counties: Eau Claire, Trempealeau, Buffalo and Jackson. Tri-County has six rate centers deployed in its host/remote switching configurations. Tri-County's rate centers are not located within the largest 100 metropolitan statistical areas.

Tri-County's service area is rural. The service territory encompasses areas that are sparsely populated. Tri-County serves only 12 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 25 times more dense than Tri-County's. This reflects the sparse population of Tri-County's service area.

**A. Technical and Economic Impacts**

At this time Tri-County does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Tri-County has only received requests for LNP from Sprint PCS and Verizon Wireless.

Tri-County contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost approximately \$175,000 for the necessary upgrades required to comply with the request that had been received and. This is over \$40 per customer. These costs, as I understand, are paid

through surcharges on our customers. There are additional that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take several weeks from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Tri-County does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Tri-County determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Tri-County received requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or was otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Tri-County to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Tri-County's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do


not have a presence in Tri-County's rate centers is another indication that they do not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS and Verizon Wireless or Tri-County, which we believe indicates that they do not operate or plan to operate within our area.

(5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Tri-County to Sprint PCS and Verizon Wireless. Without that information Tri-County does not know how to provide LNP porting. The fact that Sprint PCS and Verizon Wireless do not have a presence in Tri-County's rate centers further exacerbates the LNP technical problems.

I, Fred W. Weier, Manager of Tri-County Telephone Cooperative Inc. (Tri-County), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date:

11/03/03

  
Fred W. Weier  
General Manager

Attachment 17

**CENTURYTEL OF MIDWEST WISCONSIN LLC'S  
PETITION FOR SUSPENSION OF THE PORTING OBLIGATION**

CenturyTel of Midwest Wisconsin LLC (CenturyTel of Midwest Wisconsin) with its principle place of business at 120 Milwaukee Street, Tomah, WI 54660 operates 137,871 access lines in the State of Wisconsin. CenturyTel of Midwest Wisconsin is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and CenturyTel of Midwest Wisconsin's access lines are below the 2% threshold of 3.76 million access lines.

CenturyTel of Midwest Wisconsin provides service to customers in portions of the following counties: Barron, Burnett, Chippewa, Columbia, Crawford, Dane, Eau Claire, Florence, Forest, Fond du Lac, Grant, Green Lake, Iowa, Jackson, Jefferson, Juneau, Marinette, Marquette, Monroe, Oconto, Polk, Portage, Racine, Richland, Rock, Rusk, Sauk, Vernon, Walworth, Washburn, Waukesha and Winnebago. CenturyTel of Midwest Wisconsin has fifty-one rate centers deployed in its host/remote switching configurations. Seven of CenturyTel of Midwest Wisconsin's rate centers are located within the largest 100 metropolitan statistical areas. They are Delafield, Dousman, Eagle, East Troy, Genesee, Mukwonago and North Prairie.

CenturyTel of Midwest Wisconsin's service area is rural. The service territory encompasses areas that are sparsely populated. CenturyTel of Midwest Wisconsin serves only 39 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 8 times more dense than CenturyTel of Midwest Wisconsin's. This reflects the sparse population of CenturyTel of Midwest Wisconsin's service area.

**A. Technical and Economic Impacts**

At this time CenturyTel of Midwest Wisconsin does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider, except for the Chetek exchange for which it provides LNP for a competitive local exchange carrier. CenturyTel of Midwest Wisconsin has only received requests for LNP from Sprint PCS, T-Mobile and Verizon Wireless.

CenturyTel of Midwest Wisconsin after receiving the requests for number portability identified the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on that work and contacts with our switch we estimate that it would cost approximately \$830,000 for the necessary upgrades required to comply with the request that has been received. This is about \$6 per access line. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of

the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, we estimate it will take 6 weeks for software installation from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, CenturyTel of Midwest Wisconsin does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can CenturyTel of Midwest Wisconsin determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**


CenturyTel of Midwest Wisconsin received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS, T-Mobile and Verizon Wireless were insufficient for at least the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes. The requests also did not specify to which specific CenturyTel company they apply.
- (3) The requests do not provide the location to which CenturyTel of Midwest Wisconsin is to interconnect with Sprint PCS, T-Mobile and Verizon Wireless to port the number. As a result, CenturyTel of Midwest Wisconsin does not know if the point of interconnection will be within the geographic LATA in which CenturyTel of Midwest Wisconsin is located.
- (4) Furthermore, CenturyTel of Midwest Wisconsin do not have local number portability agreements or information from Sprint PCS, T-Mobile and Verizon Wireless. These would provide, among other things, routing, terms, conditions, networking, trunking, and other information on how the call is delivered from CenturyTel of Midwest Wisconsin to Sprint PCS, T-Mobile and Verizon Wireless. Without that information CenturyTel of Midwest Wisconsin cannot provision the switching, the network for LNP to the wireless carrier. The fact that

Sprint PCS, T-Mobile and Verizon Wireless do not have a presence in CenturyTel of Midwest Wisconsin's rate centers further exacerbates the LNP technical problems.

I, John Schafer, Manager of Government Relations, CenturyTel of Midwest Wisconsin LLC, do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11/21/03

  
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John Schafer  
Manager of Government Relations



Attachment 18

**CENTURYTEL OF NORTHWEST WISCONSIN LLC'S  
PETITION FOR SUSPENSION OF THE PORTING OBLIGATION**

CenturyTel of Northwest Wisconsin LLC (CenturyTel of Northwest Wisconsin) with its principle place of business at 104 West Wisconsin Ave.; Frederic, WI 54837 operates 20,779 access lines in the State of Wisconsin. CenturyTel of Northwest Wisconsin is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and CenturyTel of Northwest Wisconsin's access lines are below the 2% threshold of 3.76 million access lines.

CenturyTel of Northwest Wisconsin provides service to customers in portions of the following counties: Bayfield, Burnett, Douglas, Polk, Saint Croix and Washburn. CenturyTel of Northwest Wisconsin has twenty-three rate centers deployed in its host/remote switching configurations. Two of CenturyTel of Northwest Wisconsin's rate centers are located within the largest 100 metropolitan statistical areas. They are Hammond and Osceola/Dresser.

CenturyTel of Northwest Wisconsin's service area is rural. The service territory encompasses areas that are sparsely populated. CenturyTel of Northwest Wisconsin serves only 11 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over 29 times more dense than CenturyTel of Northwest Wisconsin's. This reflects the sparse population of CenturyTel of Northwest Wisconsin's service area.

**A. Technical and Economic Impacts**

At this time CenturyTel of Northwest Wisconsin does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. CenturyTel of Northwest Wisconsin has only received requests for LNP from Sprint PCS, T-Mobile and Verizon Wireless.

CenturyTel of Northwest Wisconsin after receiving the requests for number portability identified the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on that work and contacts with our switch we estimate that it would cost approximately \$238,000 for the necessary upgrades required to comply with the request that has been received. This is almost \$11.50 per access line. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, we estimate it will take 6 weeks for software installation from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, CenturyTel of Northwest Wisconsin does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can CenturyTel of Northwest Wisconsin determine its total cost of providing LNP without this information.

**B. The Requests for Porting Numbers to a Wireless Provider**


CenturyTel of Northwest Wisconsin received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS, T-Mobile and Verizon Wireless were insufficient for at least the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes. The requests also did not specify to which specific CenturyTel company they apply.
- (3) The requests do not provide the location to which CenturyTel of Northwest Wisconsin is to interconnect with Sprint PCS, T-Mobile and Verizon Wireless to port the number. As a result, CenturyTel of Northwest Wisconsin does not know if the point of interconnection will be within the geographic LATA in which CenturyTel of Northwest Wisconsin is located.
- (4) Furthermore, CenturyTel of Northwest Wisconsin do not have local number portability agreements or information from Sprint PCS, T-Mobile and Verizon Wireless. These would provide, among other things, routing, terms, conditions, networking, trunking, and other information on how the call is delivered from CenturyTel of Northwest Wisconsin to Sprint PCS, T-Mobile and Verizon Wireless. Without that information CenturyTel of Northwest Wisconsin cannot provision the switching, the network for LNP to the wireless carrier. The fact that Sprint PCS, T-Mobile and Verizon Wireless do not have a presence in CenturyTel of Northwest Wisconsin's rate centers.

I, John Schafer, Manager of Government Relations, CenturyTel of Northwest Wisconsin LLC,

do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11/21/03

  
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John Schafer  
Manager of Government Relations

**Attachment 19****TELEPHONE USA OF WISCONSIN LLC'S  
PETITION FOR SUSPENSION OF THE PORTING OBLIGATION**

Telephone USA of Wisconsin LLC (Telephone USA) with its principle place of business at 333 North Front Street; La Crosse, WI 54602 operates 137,871 access lines in the State of Wisconsin. Telephone USA is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Telephone USA's access lines are below the 2% threshold of 3.76 million access lines.

Telephone USA provides service to customers in portions of the following counties: Ashland, Barron, Dunn, Florence, Forest, Iron, Langlade, Oconto, Pepin, Pierce, Polk, Price, Rusk, Saint Croix, Sawyer and Washburn. Telephone USA has fifty rate centers deployed in its host/remote switching configurations. Five of Telephone USA's rate centers are located within the largest 100 metropolitan statistical areas. They are Elmwood, Glenwood City, Maiden Rock, Plum City and Prescott.

Telephone USA's service area is rural. The service territory encompasses areas that are sparsely populated. Telephone USA serves only 12 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are 25 times more dense than Telephone USA's. This reflects the sparse population of Telephone USA's service area.

**A. Technical and Economic Impacts**

At this time Telephone USA does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider, except for the Hayward, Park Falls, and Rice Lake exchanges for which it provides LNP for a competitive local exchange carrier. Telephone USA has only received requests for LNP from Sprint PCS, T-Mobile and Verizon Wireless.

Telephone USA after receiving the requests for number portability identified the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on that work and contacts with our switch we estimate that it would cost approximately \$810,000 for the necessary upgrades required to comply with the request that has been received. This is about \$13.50 per access line. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, we estimate it will take 6 weeks for software installation from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Telephone USA does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Telephone USA determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Telephone USA received the requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS, T-Mobile and Verizon Wireless were insufficient for at least the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes. The requests also did not specify to which specific CenturyTel company they apply.
- (3) The requests do not provide the location to which Telephone USA is to interconnect with Sprint PCS, T-Mobile and Verizon Wireless to port the number. As a result, Telephone USA does not know if the point of interconnection will be within the geographic LATA in which Telephone USA is located.
- (4) Furthermore, Telephone USA do not have local number portability agreements or information from Sprint PCS, T-Mobile and Verizon Wireless. These would provide, among other things, routing, terms, conditions, networking, trunking, and other information on how the call is delivered from Telephone USA to Sprint PCS, T-Mobile and Verizon Wireless. Without that information Telephone USA cannot provision the switching, the network for LNP to the wireless carrier. The fact that Sprint PCS and Verizon Wireless do not have a presence in Telephone USA's rate centers, except Sprint PCS has a physical presence in Rice Lake, further exacerbates the LNP technical problems.

I, John Schafer, Manager of Government Relations, Telephone USA of Wisconsin LLC, do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension

and that the information contained therein is true and accurate to the best of my knowledge,  
information, and belief.

Date: 11/21/03

  
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John Schafer  
Manager of Government Relations

**Attachment 20**

**WOOD COUNTY TELEPHONE COMPANY'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

Wood County Telephone Company (Wood County) with its principle place of business at 440 East Grand Avenue, Wisconsin Rapids WI 54495 operates 31,025 access lines in the State of Wisconsin. Wood County is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Wood County's access lines are far below the 2% threshold of 3.76 million access lines.

Wood County provides service to customers in portions of the following counties: Wood, Juneau, Adams and Portage. Wood County has four rate centers deployed in its host/remote switching configurations. Wood County's rate centers are not located within the largest 100 metropolitan statistical areas.

Wood County's service area is rural. Wood County serves only 87 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are over three and one-half times more dense than Wood County's.

**A. Technical and Economic Impacts**

At this time Wood County does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Wood County has only received requests for LNP from Sprint PCS and Verizon Wireless.

Wood County contacted its switch vendor after receiving the requests for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost up to \$210,000 for the necessary upgrades required to comply with the request that has been received. Additional upgrades and equipment (i.e. translations etc.) add \$30,000. This is almost \$8 per access line. These costs, as I understand, are paid through surcharges on our customers.

Some of the recurring costs including personnel, data dips, application peripheral etc. are estimated to be \$25,000 annually. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take six to nine months from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Wood County does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Wood County determine its total cost of providing LNP without this information.

#### **B. The Requests for Porting Numbers to a Wireless Provider**

Wood County received the requests to implement wireline to wireless portability by November 24, 2003. Sprint PCS sent it's request on August 25, 2003 and Verizon Wireless sent it's request on September 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate Wood County to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of Wood County's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a presence in our rate centers indicates they desire "location" or "geographic" portability.
- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate.

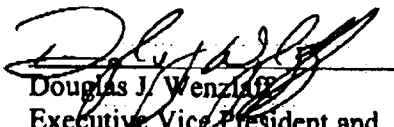


While Wood County does not know whether or not Sprint PCS and Verizon Wireless, their actions indicate they do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in Wood County's rate centers is an indication that they do not operate or plan to operate within our area. Furthermore, there are no agreements regarding the terms and conditions for the local interconnection to provide local number portability in place between Sprint PCS or Verizon Wireless and Wood County, which we believe indicates that they do not operate or plan to operate within our area.

- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from Wood County to Sprint PCS and Verizon Wireless. Without that information Wood County cannot provision the switching, the network or setup billing arrangements for LNP to a wireless carrier. Sprint PCS has a reciprocal compensation with agreement with Wood County, but that agreement does not provide the information needed for interconnection for local number portability. The fact that Sprint PCS and Verizon Wireless do not have a presence in Wood County's rate centers further exacerbates the LNP technical problems.

I, Douglas J. Wenzlaff, Executive Vice President and General Manager of Wood County Telephone Company (Wood County), do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11/5/03

  
Douglas J. Wenzlaff  
Executive Vice President and  
General Manager

**Attachment 21**

**WEST WISCONSIN TELCOM COOPERATIVE, INC.'S  
PETITION FOR RULING THAT REQUESTS  
FOR LOCAL NUMBER PORTABILITY  
WERE NOT BONA FIDE REQUESTS  
AND SUSPENSION OF THE PORTING OBLIGATION**

West Wisconsin Telcom Cooperative, Inc. (West Wisconsin) with its principle place of business at E4528 County Road "C", Downsville, WI 54735 operates 7,108 access lines in the State of Wisconsin. West Wisconsin is a rural telephone company as that term is defined under the Communications Act of 1934, as amended, because it provides telephone exchange service, including exchange access, to fewer than 50,000 access lines and serves a study area of fewer than 100,000 access lines. Moreover, it is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and West Wisconsin's access lines are far below the 2% threshold of 3.76 million access lines.

West Wisconsin provides service to customers in portions of the following counties: Chippewa, Dunn, Eau Claire, Pepin, Pierce and St. Croix. West Wisconsin has five rate centers deployed in its host/remote switching configurations. One of West Wisconsin's rate centers are located within the largest 100 metropolitan statistical areas (MSA). That rate center serves about 500 access lines that are located within the MSA or less than 10% West Wisconsin's access lines.

West Wisconsin's service area is rural. The service territory encompasses areas that are sparsely populated. West Wisconsin serves fewer than 20 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier (ILEC), serves over 300 access lines per square mile. SBC access lines are over 15 times more dense than West Wisconsin's. This reflects the sparse population of West Wisconsin's service area.

**A. Technical and Economic Impacts**

At this time West Wisconsin does not provide Local Number Portability to any commercial mobile radio service provider. It does provide LNP to one competitive local exchange carrier. West Wisconsin has only received requests for LNP from Sprint PCS and Verizon Wireless.

West Wisconsin contacted its switch vendor after receiving the request for number portability to assist in identifying the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. Based on those discussions, we were told by our switch vendor that it would cost

approximately \$105,000 for the necessary upgrades required to comply with the requests that have been received. Local Number Portability Translations vendor costs are estimated to be \$18,000 and West Wisconsin's costs are estimated at \$9,750. Training costs are estimated at \$10,800. Estimated costs for personnel to set up translations, trunking, AMA and testing for each new wireless carrier is \$2,000. This totals \$147,550 for the two wireless carriers. Therefore, the average implementation cost per West Wisconsin access line is more than \$20 each. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking (not including set-up) and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, our switch vendor advised that it would take up to six months from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, West Wisconsin does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can West Wisconsin determine its total cost of providing LNP without this information.

#### **B. The Request for Porting Numbers to a Wireless Provider**

West Wisconsin received requests to implement wireline to wireless portability by November 24, 2003. The requests received from Sprint PCS and Verizon Wireless were insufficient for the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes.
- (3) The requests seek to obligate West Wisconsin to port one of our numbers to a wireless carrier that, in turn, affords that carrier the capability to allow its mobile subscriber to use the number outside the boundaries of West Wisconsin's original rate center. In our view, that result would be considered "location" or "geographic" portability, which we understand to be an obligation that the FCC has already determined is not required by statute and would be contrary to the public interest. The fact that Sprint PCS and Verizon Wireless do not have a

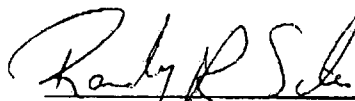
presence in our rate centers indicates they desire "location" or "geographic" portability.

- (4) The requests failed to demonstrate compliance with the FCC Rules that number portability is required only if requested by another telecommunications carrier in areas in which that telecommunications carrier is operating or plans to operate. To the best of our knowledge, Sprint PCS and Verizon Wireless do not provide service in our service territory. The fact that Sprint PCS and Verizon Wireless do not have a presence in West Wisconsin's rate centers is another indication that they do not operate or plan to operate within our area. While there is a reciprocal compensation agreement between West Wisconsin and Sprint PCS, there are no interconnection agreements regarding the terms and conditions for the local interconnection in place between Sprint PCS or Verizon Wireless and West Wisconsin, which we believe indicates that they do not operate or plan to operate within our area.
- (5) Local interconnection agreements provide, among other things, routing, terms, conditions, networking, trunking, billing and cost information and information on how the call is delivered from West Wisconsin to Sprint PCS or Verizon Wireless. Without that information West Wisconsin cannot provision the switching system, establish the network or setup billing arrangements for LNP to a wireless carrier. The fact that Sprint PCS or Verizon Wireless do not have a presence in West Wisconsin's rate centers further exacerbates the LNP technical problems.

I, Randy R. Siler, General Manager of West Wisconsin Telcom Cooperative, Inc. (West Wisconsin), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Suspension" and this attachment and that the information contained in both regarding West Wisconsin is true and accurate to the best of my knowledge, information, and belief.

Date:

11/5/03



Randy R. Siler  
General Manager

Attachment 22

**HAGER TELECOM, INC.'S  
PETITION FOR SUSPENSION OF THE  
LOCAL NUMBER PORTABILITY**

Hager Telecom, Inc. (Hager) with its principle place of business at W8108 165<sup>th</sup> Avenue; Hager City, WI 54014 operates 2,061 access lines in the State of Wisconsin. Hager is qualified to seek the Section 251(f)(2) relief because our access lines count is less than 2% of Federal Communications Commission ("FCC") reported local telephone lines in service nationwide as of December 2002. The FCC's reported number was approximately 188 million, and Hager's access lines are below the 2% threshold of 3.76 million access lines.

Hager provides service to customers in portions of Pierce county. Hager has two rate centers that remote off a third-party's switch. Both of Hager's rate centers are located within the largest 100 metropolitan statistical areas.

Hager's service area is rural. The service territory encompasses areas that are sparsely populated. Hager serves only 19 access lines per square mile of service territory. SBC, Wisconsin's largest local exchange carrier, serves over 300 access lines per square mile. SBC access lines are almost 16 times more dense than Hager's. This reflects the sparse population of Hager's service area.

**A. Technical and Economic Impacts**

At this time Hager does not provide Local Number Portability to any commercial mobile radio service provider, competitive local exchange carrier, or any telecommunications provider. Hager has only received a request for LNP from Sprint PCS.

Hager after receiving the requests for number portability identified the necessary software and/or hardware upgrades that would be needed to be deployed and tested in order to ensure a seamless transition to the a number porting environment. LNP will need to be deployed in the third-party switch that we remote off. To provide it internally it would probably require the purchase of a stand-alone switch. When our third party host installs the necessary software we could provide LNP. We are unable to estimate the costs. These costs, as I understand, are paid through surcharges on our customers. There are additional costs that we have been unable to calculate partially because of the limited information we received from the CMRS provider. These costs include finance costs, charges for accessing the LNP database, personnel, trunking and other related networking. These expenses will raise the cost to the ratepayer substantially.

Moreover, we do know know the amount of time it will take for installation from the initial order date to install and test the required upgrades. Even assuming that installation of number portability capability is achieved, that installation only partially resolves the problems of number porting to a wireless carrier.

Other unresolved implementation problems also render the provision of local number portability unduly economically burdensome and technically infeasible. For example, Hager does not know how routing, rating and recording of the end user traffic related to any number porting will be achieved, let alone the full extent of the "back office" functions that will be required (including data storage and processing) to implement such a requirement properly. Nor can Hager determine its total cost of providing LNP without this information.

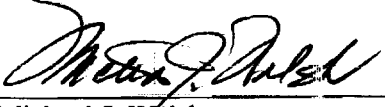
**B. The Requests for Porting Numbers to a Wireless Provider**

Hager received the requests to implement wireline to wireless portability by November 24, 2003. The request received from Sprint PCS was insufficient for at least the following reasons:

- (1) The requests failed to specify the "discrete geographical area" as required by FCC Rules.
- (2) The requests failed to specify switch information or were otherwise too generic to satisfy the FCC's requirement that requests be specific. For example, among other unfurnished information, the requests did not provide location routing numbers or point codes. The requests did not identify the exchanges involved.
- (3) The requests do not provide the location to which Hager is to interconnect with Sprint PCS to port the number. As a result, Hager does not know if the point of interconnection will be within the geographic LATA in which Hager is located.
- (4) Furthermore, Hager does not have local number portability agreements or information from Sprint PCS. These would provide, among other things, routing, terms, conditions, networking, trunking, and other information on how the call is delivered from Hager to Sprint PCS. Without that information Hager cannot provision the switching, the network for LNP to the wireless carrier. The fact that Sprint PCS do not have a presence in Hager's rate centers further exacerbates the LNP technical problems.

I, Michael J. Walsh, General Manager, Hager Telecom, Inc., do hereby declare under penalties of perjury that I have read the foregoing Petition for Suspension and that the information contained therein is true and accurate to the best of my knowledge, information, and belief.

Date: 11-21-03

  
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Michael J. Walsh  
General Manager